

From: [Jessica Blome](#)
To: [Spatz, Michelle \(ENRD\)](#)
Cc: [Rae Lovko](#); [Brent Resh](#); [Danielle Holt](#); [Morris, Frances \(ENRD\)](#)
Subject: Re: [EXTERNAL] Blue Wing Settlement Conference
Date: Friday, October 4, 2024 1:44:41 PM

Hi Michelle,

My clients are planning to attend the roundup in the Triple B HMA that week. Would BLM consider taking that roundup off calendar to accommodate their attending mediation during the week you propose below?

Otherwise, let's look at dates the week of October 14. We can make the mediation statement due Friday, October 11, with the mediation taking place late the following week.

Jessica

Jessica L. Blome
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2748 Adeline, Ste. A
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On Oct 4, 2024, at 9:58 AM, Spatz, Michelle (ENRD)
<Michelle.Spatz@usdoj.gov> wrote:

Hi Jessica,

Thanks for your patience while we conferred with BLM on their availability. We would have needed to push it back from the current dates anyway because Frances is in trial until November 1 and we have other scheduling issues within the next couple weeks. Would Plaintiffs consent to the below dates (which are earlier than our last proposal)? These would work for me, Frances, and BLM.

- November 6: Confidential Written Evaluation Statement due
- November 11-15: Pre-Settlement Conference Telephonic Conference and Settlement Conference (based on the Magistrate Judge's availability)

If Plaintiffs consent, we are happy to prepare the filing.

Thank you for your cooperation with our schedules.

<image001.jpg> Michelle M. Spatz
Trial Attorney
U.S. Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
(202) 598-9741 | michelle.spatz@usdoj.gov

From: Jessica Blome <jblome@greenfirelaw.com>
Sent: Thursday, October 3, 2024 1:55 PM
To: Spatz, Michelle (ENRD) <Michelle.Spatz@usdoj.gov>
Cc: Rae Lovko <rlovko@greenfirelaw.com>; Brent Resh <brent@brentreshlaw.com>;
Danielle Holt <Danielle@brentreshlaw.com>; Morris, Frances (ENRD)
<Frances.Morris@usdoj.gov>
Subject: Re: [EXTERNAL] Blue Wing Settlement Conference

Good morning, all,

I just left you a voicemail, Michelle, and am following up with an email. My clients were not happy that I needed to move the mediation back to November. Would it be possible to move the mediation up in October, rather than back into November? Or maintain a delay of a single week if at all possible?

I have a lot of availability in October now that my first trial settled and the November trial was moved to December.

Thank you!

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On Oct 3, 2024, at 10:10 AM, Spatz, Michelle (ENRD)
<Michelle.Spatz@usdoj.gov> wrote:

Thanks for letting us know, Jessica. It turns out the original dates don't work for us, so we will propose some new dates once we hear back from BLM on their availability.

<image001.jpg> Michelle M. Spatz
Trial Attorney
U.S. Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
(202) 598-9741 | michelle.spatz@usdoj.gov

From: Jessica Blome <jblome@greenfirelaw.com>

Sent: Thursday, October 3, 2024 1:05 PM

To: Spatz, Michelle (ENRD) <Michelle.Spatz@usdoj.gov>

Cc: Rae Lovko <rlovko@greenfirelaw.com>; Brent Resh

<brent@brentreshlaw.com>; Danielle Holt

<Danielle@brentreshlaw.com>; Morris, Frances (ENRD)

<Frances.Morris@usdoj.gov>

Subject: Re: [EXTERNAL] Blue Wing Settlement Conference

Hi Michelle,

Actually, I just learned that I have likely settled my trial the week of 10/22, so I can now meet the 10/27, 10/29 and 10/30 original deadlines. Shall we go back to those?

Jessica

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On Oct 3, 2024, at 8:02 AM, Spatz, Michelle (ENRD)
<Michelle.Spatz@usdoj.gov> wrote:

Hi Jessica – FYI I spoke a little too soon on the November dates we proposed below. While those worked for me and Frances, they do not work for BLM. Apologies – I will get back to you with another proposal soon.

Thank you!

<image001.jpg> Michelle M. Spatz
Trial Attorney
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Division
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(202) 598-9741 |
michelle.spatz@usdoj.gov

From: Jessica Blome <jblome@greenfirelaw.com>
Sent: Wednesday, October 2, 2024 6:52 PM
To: Spatz, Michelle (ENRD) <Michelle.Spatz@usdoj.gov>
Cc: Rae Lovko <rlovko@greenfirelaw.com>; Brent Resh <brent@brentreshlaw.com>; Danielle Holt <Danielle@brentreshlaw.com>; Morris, Frances (ENRD) <Frances.Morris@usdoj.gov>
Subject: Re: [EXTERNAL] Blue Wing Settlement Conference

Thank you, Michelle. I will check with my clients about these dates.

Let's plan to talk on October 9 at 11 PT. Please call my direct line below.

Jessica

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On Oct 2, 2024, at 2:59 PM, Spatz, Michelle (ENRD) <Michelle.Spatz@usdoj.gov> wrote:

Thanks, Jessica. Frances and I unfortunately don't have mutual availability that week. Would the below work for you?

- November 15: Confidential Written Evaluation Statement due
- Week of November 18-22: Pre-

Settlement Conference Telephonic
Conference and Settlement Conference
(based on the Magistrate Judge's
availability)

For our call next week, would Wednesday,
October 9 at 2pm EST work for you?

<image001.jpg> Michelle M. Spatz
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Resources Division
Wildlife & Marine
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From: Jessica Blome
<jblome@greenfirelaw.com>
Sent: Wednesday, October 2, 2024 5:21 PM
To: Spatz, Michelle (ENRD)
<Michelle.Spatz@usdoj.gov>
Cc: Rae Lovko <rlovko@greenfirelaw.com>;
Brent Resh <brent@brentreshlaw.com>;
Danielle Holt <Danielle@brentreshlaw.com>;
Morris, Frances (ENRD)
<Frances.Morris@usdoj.gov>
Subject: Re: [EXTERNAL] Blue Wing Settlement
Conference

Hi Michelle,

I'm very glad you reached out. I just found out today that my November trial setting was continued to that week in December you highlight below, which means I could move the mediation statement deadline and conference just one week. Would that work for you and your clients?

Also, I'd be happy to jump on the phone

next week. I have a fair amount of availability on 10/9 or 10/10, from 9:30 PT to 3:00 PT. I just have one call at 11 PT on 10/10 that I cannot move.

Jessica

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On Oct 2, 2024, at 2:17 PM,
Spatz, Michelle (ENRD)
<Michelle.Spatz@usdoj.gov>
wrote:

Hi Jessica,

Thanks for reaching out. Yes, Federal Defendants would consent to having the Confidential Written Evaluation Statement due on November 21. However, the week of December 2 will not work for us for the Settlement Conference itself (or for the Pre-Settlement Conference Telephonic Conference). We would propose:

- November 21: Confidential Written Evaluation Statement due
- Week of December 9-13: Pre-Settlement Conference Telephonic Conference and Settlement Conference (based on the Magistrate Judge's availability)

If that works for you, you can represent that Federal Defendants consent to that schedule in your filing.

Relatedly, we thought it might be helpful for us to touch base sometime before the settlement conference after you've had a chance to digest the court's ruling. Would you be available for a call sometime next week or the following week?

Thank you.

<image001.jpg> Michelle M. Spatz
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michelle.spatz@usdoj.gov

From: Jessica Blome
<jblome@greenfirelaw.com>
Sent: Friday, September 27, 2024
2:48 PM
To: Spatz, Michelle (ENRD)
<Michelle.Spatz@usdoj.gov>;
Morris, Frances (ENRD)
<Frances.Morris@usdoj.gov>
Cc: Rae Lovko
<rlovko@greenfirelaw.com>;
Brent Resh
<brent@brentreshlaw.com>;
Danielle Holt
<Danielle@brentreshlaw.com>
Subject: [EXTERNAL] Blue Wing
Settlement Conference`

Hi Michelle,

I'm sure you saw the court's notification setting our settlement conference date and deadlines. I am writing to see if the DOJ will agree to a 30-day continuance. I have a jury trial in the Northern District of California the week of October 22 and then a bench trial in the Middle District of Florida the week of November 4, so I'd like to move the settlement conference to the end of November. Would the DOJ consent to making settlement conference due November 21 with the settlement conference itself taking place the week of December 2, at the court's

availability?

Thank you,

Jessica

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